

**COLE, SCHOTZ, MEISEL,
FORMAN & LEONARD, P.A.**

A Professional Corporation
Court Plaza North
25 Main Street
P.O. Box 800
Hackensack, New Jersey 07602-0800
Michael D. Sirota, Esq.
Gerald H. Gline, Esq.
David M. Bass, Esq.
Ryan T. Jareck, Esq.
(201) 489-3000
(201) 489-1536 Facsimile
Attorneys for 710 Long Ridge Road Operating
Company II, LLC, *et al.*, Debtors-in-Possession

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY
HONORABLE DONALD H. STECKROTH
CASE NO. 13-13653 (DHS)

In re:

710 LONG RIDGE ROAD OPERATING
COMPANY II, LLC, *et al.*,¹

Debtors-in-Possession.

Chapter 11
(Jointly Administered)

**NOTICE OF DEBTORS' MOTION FOR
AN ORDER EXTENDING INTERIM
MODIFICATIONS TO THE DEBTORS'
COLLECTIVE BARGAINING
AGREEMENTS WITH THE NEW
ENGLAND HEALTH CARE
EMPLOYEES UNION, DISTRICT 1199,
SEIU PURSUANT TO 11 U.S.C. § 1113(e)**

HEARING DATE AND TIME:

_____, 2013, at __: __ .m.

ORAL ARGUMENT REQUESTED

TO: All Parties-in-Interest

¹ The Debtors in these Chapter 11 cases, along with the last four digits of each Debtor's federal identification number are: 710 Long Ridge Road Operating Company II, LLC d/b/a Long Ridge of Stamford (4809), 240 Church Street Operating Company II, LLC d/b/a Newington Health Care Center (4730), 1 Burr Road Operating Company II, LLC d/b/a Westport Health Care Center (4839), 245 Orange Avenue Operating Company II, LLC d/b/a West River Health Care Center (4716) and 107 Osborne Street Operating Company II, LLC d/b/a Danbury Health Care Center (4676).

PLEASE TAKE NOTICE that on the date herein, 710 Long Ridge Road Operating Company II, LLC d/b/a Long Ridge of Stamford, 240 Church Street Operating Company II, LLC d/b/a Newington Health Care Center, 1 Burr Road Operating Company II, LLC d/b/a Westport Health Care Center, 245 Orange Avenue Operating Company II, LLC d/b/a West River Health Care Center and 107 Osborne Street Operating Company II, LLC d/b/a Danbury Health Care Center, the within debtors and debtors-in-possession (the “**Debtors**”), by and through their counsel, Cole, Schotz, Meisel, Forman & Leonard, P.A., filed a motion (the “**Motion**”) for an order extending this Court’s April 10, 2013 order [Docket No. 230], which authorized the Debtors to continue to implement the interim modifications to their collective bargaining agreements with the New England Health Care Employees Union, District 1199, SEIU under 11 U.S.C. § 1113(e) that were originally approved by this Court’s March 4, 2013 order [Docket No. 66]. Pursuant to an Order Shortening Time served herewith, on _____, **2013**, at ____:____**m.**, the Debtor shall move before the Honorable Donald H. Steckroth, United States Bankruptcy Judge, at the United States Bankruptcy Court, Martin Luther King, Jr. Federal Building, 50 Walnut Street, Newark, New Jersey 07102, for entry of an Order granting the Motion.

PLEASE TAKE FURTHER NOTICE that in support of the Motion, the undersigned shall rely on the accompanying Verified Application and Declaration of Michael D. Sirota, Esq., dated June 27, 2013, which sets forth the relevant factual and legal basis upon which the relief requested should be granted. A proposed Order granting the relief requested in the Motion also is submitted herewith.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the relief requested in the Motion shall be filed and served in accordance with the Order Shortening Time.

PLEASE TAKE FURTHER NOTICE that unless objections are timely filed and served, the Motion shall be deemed uncontested in accordance with D.N.J. LBR 9013-1(a), and the relief requested may be granted without further notice or hearing.

PLEASE TAKE FURTHER NOTICE that the undersigned request oral argument on the return date of the Motion.

COLE, SCHOTZ, MEISEL,
FORMAN & LEONARD, P.A.
Attorneys for 710 Long Ridge Road Operating
Company II, LLC, *et al.*, Debtors-in-Possession

By: /s/ Michael D. Sirota
Michael D. Sirota, Esq.
Gerald H. Gline, Esq.
David M. Bass, Esq.
Ryan T. Jareck, Esq.

DATED: June 27, 2013